

**BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
Docket No. 2021-66-A**

Clinton Newberry Natural Gas Authority,)
)
Petitioner.)
)
)
<i>In re:</i>)
)
South Carolina Office of Regulatory)
Staff's Motion to Solicit Comments from)
Utilities and Other Interested Stakeholders)
Regarding Measures to be Taken to)
Mitigate Impact of Threats to Safe and)
Reliable Utility Service.)

PETITION TO INTERVENE

NOW COMES Clinton Newberry Natural Gas Authority (CNNGA), being hereafter referred to as the "Petitioner", before the Public Service Commission of South Carolina, Utilities Division (PSC), and, pursuant to PSC Reg. 103-825, hereby petition to intervene in the above-captioned matter on the following grounds.

1. The Petitioner is a special purpose district organized in accordance with South Carolina law to deliver and/or supply natural gas to residential, industrial, and other customers located in the counties of Newberry, Laurens and a portion of Spartanburg. As such, it is exempt from economic regulation by the PSC. *See* S.C. Code Ann. § 58-5-920(f) (defining "gas utility" to exclude "gas authorities,

municipalities and public service districts and other political subdivisions of this State ... from any economic regulation by [PSC]”); *see also* PSC Reg. 103-401(1).

2. On February 19, 2021, the Honorable Henry McMaster, Governor of South Carolina (the Governor), in a letter to the Office of Regulatory Staff (ORS) Executive Director Nanette Edwards, requested that the ORS “undertake a comprehensive review of the State’s public and private power grid to evaluate its ability to withstand potential ice storms and other dangerous winter weather conditions.” The Governor further encouraged “utilities not currently subject to the jurisdiction of ORS and the PSC ... to intervene in the matter to facilitate a comprehensive and collaborative review.”

3. In response thereto, on February 22, 2021, the ORS filed with PSC a “Motion to Solicit Comments from Utilities and Other Interested Stakeholders Regarding Measures to be Taken to Mitigate Impacts of Threats to Safe and Reliable Utility Service” pursuant to PSC Reg. 103-829, asking the Commission:

[T]o open a docket and require electric and natural gas utilities to provide information to the Commission regarding the measures that have been taken, or will be taken, to: 1) mitigate the negative impacts of ice storms and other dangerous weather conditions to the provision of safe and reliable utility service, and 2) ensure peak customer demands on the utility system can be met during extreme weather scenarios.

4. Thereafter, on March 10, 2021, PSC issued a Commission Directive establishing such docket, in addition to “Guidelines for Comments by Utilities and Other Interested Stakeholders Regarding Mitigation of Impact of Threats to Safe and Reliable Utility Service” (the “Order”). Order No. 2021-163, in Docket No. 2021-66-A. In its Order, the PSC endeavored to “encourage the participation in this Docket of ... non-regulated electric and gas utilities in South Carolina.”

5. The Petitioner, as a provider of natural gas supply to thousands of customers, appreciate the opportunity to participate in this proceeding and hopes to be able to be a valuable contributor thereto.

6. The Petitioner believes it is in the interest of its customers, as well as the South Carolina community as a whole, that CNNGA be allowed to intervene in this proceeding.

7. The Petitioner asserts that granting its request to be a party of record in this proceeding is in accordance with the Governor's request and consistent with PSC's wish for participation by non-regulated energy providers.

8. Pursuant to PSC Reg. 103-804.T, Petitioner states it is represented by the following counsel in this proceeding:

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WHEREFORE, Petitioner hereby seeks, pursuant to PSC Reg. 103-825, intervention in this matter, including, but not limited to, the rights to receive copies of all notices, pleadings, and other related correspondence; to appear as a party; and to offer testimony and other evidence.

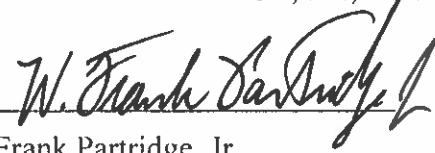
Newberry, SC

LAW OFFICE OF

W. FRANK PARTRIDGE, JR., P.A.

Date: April 29, 2021

By:



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ATTORNEY FOR PETITIONER

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CERTIFICATE OF SERVICE

The undersigned does hereby certify that service has been made upon the persons named below of the Petition to Intervene on behalf of the above-named Petitioner in the referenced matter, via electronic mail, as follows:

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This 29th day of April, 2021

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A handwritten signature in black ink, appearing to read "W. Frank Sanborn", is written over a horizontal line.